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CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF OHIO TOLEDO

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO WESTERN DIVISION

UNITED STATES OF AMERICA,) CASE NO.: 3:18 CV 1908
Plaintiff,	JUDGE HELMICK
V.	MAG. JUDGE JAMES R. KNEPP II
GREGORY J. GERBER, M.D.,) MOTION FOR LEAVE TO FILE) COMPLAINT UNDER SEAL
AND) COMPLAINT ONDER SEAL
GREGORY J. GERBER, MD LLC	
DEFENDANTS.	

The United States of America, through its undersigned counsel, respectfully requests leave to file under seal the attached Complaint; Motion for a Temporary Restraining Order and Preliminary Injunction; Memorandum of Law in Support of Motion for Temporary Restraining Order and Preliminary Injunction; Proposed Temporary Restraining Order; Affidavit of Jessica Stransky Chrisman, with Exhibits; Affidavit of Kendall Miller, with Exhibits; and Affidavit of Milton H. Landers, D.O., Ph. D., with Exhibits. The United States is engaged in parallel civil and criminal investigations of Defendants Gregory J. Gerber, M.D. and Gregory J. Gerber, MD LLC, with execution of search warrants planned for August 22, 2018. In order to prevent the

destruction of evidence prior to the execution of the search warrants, the United States requests that the seal remain in place only until the search warrants can be executed.

Respectfully submitted,

JUSTIN E. HERDMAN United States Attorney

CHAD A. READLER
Acting Assistant Attorney General
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Civil Division

By

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